



08-CV-00381-RCPT

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KELLY N. HANSEN,

Plaintiff,

v.

CHILDREN'S HOSPITAL AND
REGIONAL MEDICAL CENTER,
INC., a Washington corporation and
MARTHA A. DIMMERS, an individual,

Defendants.

No. 08-0381L

STIPULATED MOTION

-AND-

**[PROPOSED] ORDER EXTENDING
DISCOVERY DEADLINE FOR
LIMITED PURPOSE**

NOTE FOR HEARING: 12/14/2009

STIPULATION

The parties, by and through their undersigned counsel, stipulate and jointly move the Court as follows:

1. By Minute Order dated September 17, 2009, the Court set the trial date and related deadlines in this matter. The Order provides, in pertinent part, that discovery must be completed by January 3, 2010.

2. Due to illness of witnesses and various scheduling conflicts, the parties have a few depositions that they will not be able to complete prior to January 3, 2010. Specifically, Plaintiff wants to depose Ruth Benfield, Cheryl Clarke and Kristin Johnson, and Defendant wants to depose Plaintiff's counselor,

STIPULATED MOTION AND ORDER EXTENDING DISCOVERY
DEADLINE FOR LIMITED PURPOSE (08-0381) - 1
4822-7892-8389.01
121409/1459

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1 Melicent Whinston. The parties agree that it would be desirable to allow such
2 discovery, and that it can be completed prior to the end of January without
3 affecting any of the other deadlines in the case.

4 3. In light of the above, the parties jointly seek an extension of the
5 discovery deadline in this case to January 29, 2010 for the limited and sole
6 purpose of allowing the parties to take the depositions of Ruth Benfield, Cheryl
7 Clarke, Kristin Johnson, and Melicent Whinston, and to conduct follow up
8 discovery, if any, necessitated by new issues raised during such depositions that
9 could not have been anticipated previously.

10 STIPULATED and AGREED this 14th day of December, 2009.
11

12 RIDDELL WILLIAMS P.S.
13

14 By: s/ Karen F. Jones
15 Karen F. Jones, WSBA #14987
16 Skylar A. Sherwood, WSBA #31896
17 Attorneys for Defendants
18

19 GORDON THOMAS HONEYWELL
20 MALANCA PETERSON
21

22 By: s/ Andrea H. McNeely (approval via email)
23 12/11/09
24 James Walter Beck, WSBA #34208
25 Andrea H. McNeely, WSBA #36156
26 Bryan D. Doran, WSBA #38480
 Attorneys for Plaintiff

ORDER

The parties having jointly stipulated and agreed, IT IS HEREBY ORDERED:

1. The deadline for completing all discovery in this case shall be extended until January 29, 2010, for the limited and sole purpose of allowing the parties to take the depositions of Ruth Benfield, Cheryl Clarke, Kristin Johnson, and Melicent Whinston, and to conduct follow up discovery, if any, necessitated by new issues raised during such depositions that could not have been anticipated previously.

DATED this 16th day of December, 2009/2010.

Honorable Robert S. Lasnik
United States District Court Judge

Honorable Robert S. Lasnik
United States District Court Judge

Presented by:

RIDDELL WILLIAMS P.S.

By: s/ Karen F. Jones

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Skylar A. Sherwood, WSBA #31896
Attorneys for Defendants

GORDON THOMAS HONEYWELL MAIANCA PETERSON

By: s/ Andrea H. McNeely (approval via email 12/11/09)

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**STIPULATED MOTION AND ORDER EXTENDING DISCOVERY
DEADLINE FOR LIMITED PURPOSE (08-0381) - 3**
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